

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

DEBRA REEVES-HOWARD,)
)
)
Plaintiff,)
)
)
v.) **Case No. 3:07cv967-CSC**
)
)
SOUTHERN UNION STATE)
COMMUNITY COLLEGE, ET AL.,)
)
Defendants)

REPORT OF PARTIES' PLANNING MEETING

1. **Appearances.** Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on January 28, 2008, via telephone, and was attended by:

a. Theron Stokes, Montgomery, Alabama and Candis McGowan, Birmingham, Alabama, on behalf of the plaintiff Debra Reeves-Howard.

b. Robert T. Meadows, III, Opelika, Alabama on behalf of defendants Southern Union State Community College, Central Alabama Skills Training Consortium and Claude O. McCartney.

2. **Pre-Discovery Disclosures.** The parties will exchange by February 28, 2008 the information required by Fed R. Civ. P. 26(a)(1).

3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:

A. Discovery will be needed on the following subjects:

- (1) Plaintiff's claims in the Complaint, and
- (2) Defendants' defenses as alleged in the Answer.

B. All discovery commenced in time to be completed by December 2, 2008.

- C. Maximum of thirty (30) interrogatories, including subparts, by each party to any other party. Responses due thirty (30) days after service.
- D. Maximum of twenty (20) requests for admission, with no subparts allowed, by each party to any other party. Responses due thirty (30) days after service.
- E. Maximum of fifteen (15) depositions by plaintiff and fifteen (15) by defendants. Each deposition is limited to maximum of seven (7) hours unless extended by agreement of parties.
- F. Report from retained experts under Rule 26(a)(2) due:
 - (1) from plaintiff by September 8, 2008;
 - (2) from defendants by October 22, 2008.
- G. Supplements under Rule 26(e) are due 30 days before the close of discovery, or as soon as reasonably possible after the information and documents are discovered.

4. **Other Items.**

- A. The parties do not request a conference with the court before entry of the scheduling order.
- B. The plaintiff should be allowed until July 21, 2008 to join additional parties and amend the pleadings.
The defendants should be allowed until August 15, 2008 to join additional parties and to amend the pleadings.
- C. All potentially dispositive motions should be filed by November 3, 2008.
- D. Settlement cannot be evaluated prior to the conclusion of discovery.

- E. The parties request a final pretrial conference in at least one month prior to the trial date.
- F. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due thirty (30) days prior to trial.
- G. Parties should have ten (10) days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).
- H. The case should be ready for trial by early Spring 2009, and at this time is expected to take approximately 3-4 days.

Respectfully submitted,

Date: January 29, 2008

/s/ Theron Stokes

Theron Stokes (STO012)

Attorney for Plaintiff Debra Reeves-Howard

P.O. Box 4177

Montgomery, AL 36103-4177

Telephone: (334) 834-9790

Facsimile: (334) 834-7034

Email: therons@alaedu.org

/s/ Candis A. McGowan

Candis A. McGowan

Attorney for Plaintiff Debra Reeves Howard

Wiggins, Childs, Quinn & Pantazis

The Kress Building

301 19th Street North

Birmingham, AL 35203

Telephone: (205) 314-0500

Facsimile: (205) 254-1500

Email: cmcgowan@wcqp.com

ATTORNEYS FOR DEFENDANTS:

/s/ Robert T. Meadows, III

Robert T. Meadows, III (MEA012)

Capell Howard PC

P.O. Drawer 2268

Opelika, AL 36803-2268

Telephone: 334-501-1540

Facsimile: 334-501-4512

Email: rtm@chlaw.com